

Remarks

Reconsideration of the above-identified patent application in view of the present amendment and the following remarks is respectfully requested.

The Office Action of July 9, 2004 rejected claims 11-14 as lacking utility under 35 U.S.C. §101 and as being indefinite under 35 U.S.C. §112, second paragraph. The Office Action further rejected claims 1-15 as being anticipated under 35 U.S.C. §102(e) by Matsushiro, U.S. Patent No. 6,661,351.

This amendment cancels claims 1-15 and adds new claims 16-28. It is respectfully suggested that new claims 16-28 patentably define over Matsushiro and place the above-identified patent application in a condition for allowance.

New claim 16 recites an arrangement for remotely controlling convenience functions of a plurality of vehicles. The arrangement comprises a plurality of vehicle-based receivers. Each one of the plurality of vehicles includes an associated one of the plurality of vehicle-based receivers. Each vehicle-based receiver has an associated identification and is configured to receive remote convenience function request signals. Each vehicle-based receiver is responsive to receipt of a remote convenience function request signal including its associated identification for controlling the performance of a requested convenience function. The arrangement also comprises a portable transmitter for transmitting remote convenience function request signals. The portable transmitter is capable of communicating with the plurality of vehicle-based receivers. The portable transmitter includes a memory in which is stored the associated identification of each of the plurality of vehicle-based receivers. The portable transmitter includes means for selecting an associated

identification of one of the plurality of vehicle-based receivers for which to include in remote convenience function signals to be transmitted.

It is respectfully suggested that new claim 16 patentably defines over Matsushiro. Particularly, claim 16 recites that the portable transmitter includes a memory in which is stored the associated identification of each of the plurality of vehicle-based receivers. It is respectfully suggested that Matsushiro fails to teach or suggest this feature of claim 16.

Matsushiro is directed to remotely controlling radio controlled ("RC") cars 200. Matsushiro discloses four RC cars 200, each having its own identification. (Col. 5, lines 59-60) Matsushiro also discloses four transmitters 100, each having an identification that is associated with an identification of one of the RC cars 200. (Col. 5, lines 50-60). Matsushiro teaches that each transmitter 100 includes an ID switch 102 for setting any one of four combinations of 2-bit data. (Col. 6, lines 11-14). Thus, the transmitters 100 of Matsushiro do not include a memory in which is stored the associated identification of each of the plurality of vehicle-based receivers. Instead, the ID switch 102 of the transmitters 100 of Matsushiro are formed from a 2-bit DIP switch in which associated switches must be toggled into a position corresponding to either a digital zero or a digital one. Since Matsushiro fails to include a portable transmitter having a memory in which is stored the associated identification of each of the plurality of vehicle-based receivers, claim 16 patentably defines over Matsushiro and, allowance of claim 16 is respectfully requested.

Moreover, it is respectfully suggested that Matsushiro also fails to teach or suggest vehicle-based receivers, each of which is responsive to receipt of a remote

convenience function request signal including its associated identification for controlling the performance of a requested convenience function. The RC cars 200 of Matsushiro are responsive to received signals for controlling a drive motor and a steering motor. (Col. 6, lines 25-35). It is respectfully suggested that control of a drive motor and a steering motor of an RC car is not control of a convenience function of a vehicle. Therefore, for this further reason, allowance of claim 16 is respectfully requested.

Claims 17-27 depend from claim 16 and are allowable for at least the same reasons as claim 16. Additionally, claims 17-27 are allowable for the specific limitations of each claim.

Specifically, claim 19 recites that the convenience function includes changing a locked condition of a vehicle door. Matsushiro fails to teach or suggest this feature of claim 19. Therefore, allowance of claim 19 is respectfully requested.

Claim 20 recites that each of the vehicle-based receivers includes an associated decryption key for decrypting portions of received remote convenience function request signals. Claim 20 also recites that the means for selecting an associated identification also selects an encryption key for encrypting remote convenience function request signals. The selected encryption key corresponds to the decryption key for the vehicle-based receiver having the associated identification. Matsushiro fails to teach or suggest these features of claim 20. Therefore, allowance of claim 20 is respectfully requested.

Claim 21 recites that each vehicle-based receiver is part of a vehicle-based transceiver that further includes a vehicle-based transmitter for transmitting a

feedback signal. Claim 21 further recites that the portable transmitter is part of a portable transceiver that includes a receiver portion for receiving the feedback signal. The portable transceiver further includes a display for indicating receipt of the feedback signal. Matsushiro fails to teach or suggest these features of claim 21. Therefore, allowance of claim 21 is respectfully requested.

New claim 28 is similar to claim 16 and further recites that the arrangement comprises a plurality of portable transmitters. Each one of the plurality of portable transmitters is capable of communicating with the plurality of vehicle-based receivers. New claim 28 is allowable over Matsushiro for at least reasons similar to those set forth above with regard to claim 16. Therefore, allowance of claim 28 is respectfully requested.

In view of the foregoing, it is respectfully submitted that the above-identified patent application is in condition for allowance, and allowance of the above-identified patent application is respectfully requested.

Please charge any deficiency or credit any overpayment in the fees for this amendment to our Deposit Account No. 20-0090.

Respectfully submitted,



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